

# **EXHIBIT F**

**LETTER FROM SCANA RE ORS REQUEST NO. 5-26**



K. Chad Burgess  
Director & Deputy General Counsel

[chad.burgess@scana.com](mailto:chad.burgess@scana.com)

July 31, 2018

**VIA ELECTRONIC MAIL AND U.S. FIRST CLASS MAIL**

Matthew T. Richardson, Esquire  
**WYCHE, P.A.**  
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**Re: Discovery Responses of the Joint Applicants in *Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc.*, Docket No. 2017-370-E**

Dear Matthew:

The purpose of this letter is to follow up on my letter to you dated July 20, 2018, concerning ORS Request No. 5-26.

In your most recent letter dated July 17, 2018, you rely on the fact that Norm Richardson, an ORS consultant, had access to certain case studies and analyses concerning completing Unit 2 and abandoning or delaying Unit 3 to support the argument that a number of documents on SCE&G's privilege log are not privileged. SCE&G has further investigated this, and upon information and belief, while Norm Richardson did have access to certain documents related to the Estimate to Complete work done by the commercial and construction teams, he did not have access to all of the documents related to the decision to abandon the NND Project. Rather, Norm Richardson was given access to two folders: 1) a folder entitled "2017 ETC Schedule" which housed only those non-privileged documents created by the commercial/construction teams to evaluate the Owners' position post-Westinghouse's bankruptcy and 2) a folder housing documents related to resource planning. ORS's consultant was *not*, however, given access to the privileged documents SCE&G refers to in its response to your letter dated July 20, 2018. These privileged documents are studies specifically prepared at the direction of outside regulatory counsel related to the abandonment analysis. The documents Mr. Richardson had access to are therefore separate and apart from these documents prepared in anticipation of regulatory litigation that were logged on SCE&G's privilege log.

(Continued . . . )

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If you have any questions, please advise.

Very truly yours,



K. Chad Burgess

KCB/kms  
Enclosures